

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHEN DISTRICT OF OHIO**

MALIBU MEDIA, LLC.,)	Civil Action No.: 3:14-cv-00154-WHR
)	
Plaintiff,)	
)	
v.)	
)	
CYNTHIA E. BEATY,)	
)	
Defendant,)	
_____)	

MOTION FOR LEAVE TO FILE ANSWER OUT OF TIME BY DEFENDANT,
CYNTHIA E. BEATY

Now comes the Defendant, CYNTHIA E. BEATY, by and through the undersigned counsel, and respectfully moves this Court for an Order granting leave of Court to file an untimely Answer for the reason that the Defendant recently became aware of the nature of the proceeding and immediately retained Counsel so that the case may be heard on the merits. Counsel was just retained to represent the Defendant, Cynthia E. Beaty, on December 18, 2014.

WHEREFORE, the Defendant, Cynthia E. Beaty, moves this Court for an Order granting leave of Court to file his Answer. A copy of the proposed Answer is attached. Counsel for Plaintiff has been notified of said request and did not respond.

Respectfully submitted,

By: /s/ Thomas M. Kollin
THOMAS M. KOLLIN #0066964
The Kollin Firm, LLC
2372 Lakeview Drive, Suite H
Beavercreek, Ohio 45431
TEL: 937-490-4700
FAX: 937-490-4666
ATTORNEY FOR DEFENDANT

By: /s/ Gregory O. Cox
GREGORY O. COX #0087222
The Kollin Firm, LLC
2372 Lakeview Drive, Suite H
Beavercreek, Ohio 45431
TEL: 937-490-4700
FAX: 937-490-4666
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2014, I electronically filed the foregoing document with the Clerk of the Court and all parties using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

By: /s/ Gregory O. Cox
Gregory O. Cox, 0087222

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHEN DISTRICT OF OHIO**

MALIBU MEDIA, LLC.,)	<u>Civil Action No.: 3:14-cv-00154-WHR</u>
)	
Plaintiff,)	
)	
v.)	
)	
CYNTHIA E. BEATY,)	
)	
Defendant,)	
_____)	

**ENTRY GRANTING LEAVE TO FILE ANSWER OUT OF TIME BY
DEFENDANT, CYNTHIA E. BEATY**

Upon Motion by counsel and for good cause shown it is the Order of this Court that the Defendant, CYNTHIA E. BEATY be granted leave to file his Answer in the above captioned matter.

JUDGE